

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CORRECT TRANSMISSION, LLC,

Plaintiff,

v.

NOKIA OF AMERICA CORPORATION,

Defendant.

Case No. 2:22-cv-00343-JRG-RSP

**JOINT MOTION TO DISMISS WITH PREJUDICE
PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(ii)**

Plaintiff Correct Transmission, LLC (“Plaintiff”) and Defendant Nokia of America Corporation (“Defendant”) (collectively, “the Parties”) have settled their respective claims for relief asserted in this litigation. Accordingly, the Parties respectfully request that all claims for relief and causes of action asserted against Defendant by Plaintiff and all counterclaims asserted by Defendant against Plaintiff in this litigation be dismissed with prejudice, and with each party bearing its own attorneys’ fees and costs.

So agreed and stipulated.

A proposed order is attached herewith.

Dated: December 26, 2024

Respectfully submitted,

/s/ J. Travis Underwood

Gregory S. Dovel
CA State Bar No. 135387
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401
Telephone: 310-656-7066
Email: greg@dovel.com

John Jeffrey Eichmann
(Cal. Bar No. 227472)
(admitted in the Eastern District of Texas)
EICHMANN, a professional corporation
225 Arizona Avenue, Suite 300
Santa Monica, California 90401
310-237-9190 (tel.)
jeichmann@eichmann.com

J. Travis Underwood
Texas Bar No. 24102587
GILLAM & SMITH LLP
102 N. College, Suite 800
Tyler, Texas 75702
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: travis@gillamsmithlaw.com

Attorneys for Plaintiff

/s/ Thomas W. Davison

Deron R. Dacus (TX Bar No. 00790553)
THE DACUS FIRM
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Telephone: (903) 705-7233
Facsimile: (903) 581-2543
Email: ddacus@dacusfirm.com

Michael C. Smith
SCHEEF & STONE, LLP
State Bar No. 18650410
113 East Austin Street
Marshall, TX 75670

Tel.: (903) 938-8900

Michael.Smith@solidcounsel.com

John D. Haynes (GA Bar No. 340599)

David Frist (GA Bar No. 205611)

Sloane Kyrakis (GA Bar No. 878240)

ALSTON & BIRD LLP

1201 West Peachtree Street

Atlanta, GA 30309

Telephone: (404) 881-7000

Facsimile: (404) 881-7777

Email: john.haynes@alston.com

Email: david.frist@alston.com

Email: sloane.kyrakis@alston.com

Thomas W. Davison (FL Bar No. 55687)

ALSTON & BIRD LLP

950 F St NW Washington, DC 20004

Phone: (202) 239-3300

Fax: 202.239.3333

Email: tom.davison@alston.com

M. Scott Stevens (NC Bar No. 37828)

Nicholas C. Marais (NC Bar No. 53533)

Karlee N. Wroblewski (NC Bar No. 54043)

Erin Beaton (NC Bar No. 59594)

ALSTON & BIRD LLP

1120 South Tryon Street, Suite 300

Charlotte, NC 28203-6818

Telephone: (704) 444-1000

Facsimile: (704) 444-1111

scott.stevens@alston.com

karlee.wroblewski@alston.com

erin.beaton@alston.com

Katherine G. Rubschlager (CA Bar. No. 328100)

ALSTON & BIRD LLP

560 Mission St., Suite 2100

San Francisco, CA 94105

Telephone: (415) 243-1000

Facsimile: (415) 243-1001 Email:

katherine.rubschlager@alston.com

Attorneys for Defendant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the Parties met and conferred to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

/s/ J. Travis Underwood

J. Travis Underwood

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document *via* the Court's CM/ECF system on December 26, 2024.

/s/ J. Travis Underwood

J. Travis Underwood